

REMARKS

In the Office Action dated May 18, 2005, the title was objected to; claims 1-11 and 33-35 were rejected under 35 U.S.C. § 103 over “applicant’s admitted prior art (AAPA)” in view of U.S. Patent No. 6,603,525 (Yamakita).

Applicant acknowledges the indication that claims 17-32 have been allowed, and the indication that claims 12-16 would be allowable if rewritten in independent form. Claims 12 and 15 have been amended from dependent form to independent form, with the scope of the claims *unchanged*, to place these claims in condition for allowance.

The title has been amended to address the objection.

Amended claim 1 recites an image display apparatus that has an array substrate on which are formed a pixel electrode, common electrode, switching element, and auxiliary electrode. Note that both the common electrode and auxiliary electrode are formed on the same array substrate as the pixel electrode.

In the obviousness rejection of claim 1, the Office Action conceded that the “AAPA” (Fig. 9 of the present application) does not disclose a common electrode set at a first electric potential and an auxiliary electrode set at a second, different electric potential. 5/18/2005 Office Action at 3. However, the Office Action relied upon Yamakita as disclosing this element. *Id.*

It is respectfully submitted that Yamakita does not suggest a modification of the “AAPA” to achieve the claimed invention. Fig. 9 of the present application, along with the corresponding text, emphasizes that *both* the common electrode and auxiliary electrode are connected to the *same* electric potential. Yamakita does *not* suggest a modification of the Fig. 9 arrangement such that the common electrode and auxiliary electrode are set at different electric potentials.

The Office Action specifically cited to column 19, lines 2-33, of Yamakita. This passage of Yamakita refers to Figure 23 of Yamakita, which discloses a counter electrode 2 and auxiliary electrodes 51 formed on a color filter substrate 102, and pixel electrodes 6 formed on an array substrate 103. A liquid crystal layer 4 is provided between the color filter substrate 102 and array substrate 103 of Yamakita. In column 19, Yamakita states that a voltage applied to the counter electrode 2 can be different from the auxiliary electrodes 51. Yamakita, 19:22-25. However, this teaching in Yamakita of applying different voltages to the counter electrode 2 and the auxiliary electrodes 51 does *not* suggest applying different voltages to an auxiliary electrode

and a common electrode that are formed on the *same* array substrate as the pixel electrode, as recited in claim 1.

Note also that the auxiliary electrodes 51 of Yamakita do *not* form an auxiliary capacitance with a portion of the pixel electrode 6 depicted in Figure 23 of Yamakita. In fact, it is noted that a liquid crystal layer 4 is positioned between the auxiliary electrodes 51 and the pixel electrodes 6, which would be a strong indication that the auxiliary electrodes 51 and pixel electrodes 6 do not provide an auxiliary capacitance.

In view of the foregoing, it is clear that there existed no motivation or suggestion to combine Fig. 9 of the present application with Yamakita to achieve the claimed invention. Furthermore, even if Fig. 9 and Yamakita can be combined, the hypothetical combination of Fig. 9 and Yamakita would not have taught or suggested *all* elements of claim 1. Therefore, it is respectfully submitted that the Office Action cannot establish a *prima facie* case of obviousness against claim 1.

Independent claim 33 has also been amended and is allowable for similar reasons.

Dependent claims are allowable for at least the same reasons as corresponding independent claims.

The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (CMO.0011US).

Respectfully submitted,

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